

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AECOM ENERGY & CONSTRUCTION, INC.,)	
)	
Plaintiff,)	
)	Case No. 20-2016C
v.)	
)	Judge Tapp
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

**DEFENDANT’S UNOPPOSED SECOND MOTION FOR AN ENLARGEMENT
OF TIME IN WHICH TO FILE ITS RESPONSE TO PLAINTIFF’S COMPLAINT**

Pursuant to Rules 6(b)(1) and 6.1 of the Rules of the United States Court of Federal Claims (RCFC), defendant, the United States, respectfully requests a 21-day enlargement of time within which to file its response to the complaint in this matter. Our response is currently due on April 30, 2021. The requested enlargement would move the deadline for the filing of our response to May 21, 2021. We have previously sought a 60-day enlargement of time for this purpose. Defendant’s counsel has contacted plaintiff’s counsel regarding the proposed enlargement and has been informed that plaintiff does not object to this request for an enlargement of time.

We have made substantial progress regarding our response since the filing of our previous motion for enlargement. However, we need additional time to conduct further inquiries and consult with counsel for the Department of Energy (DOE) regarding the many detailed factual allegations contained in the 714-paragraph complaint. Furthermore, an enlargement is necessary to provide sufficient time to obtain both agency review and internal supervisory review at the Department of Justice of our response to plaintiff’s complaint.

For these reasons, we respectfully request that the Court grant this unopposed motion for enlargement and set a deadline of May 21, 2021, for the filing of the Government’s response to plaintiff’s complaint.

Respectfully submitted,

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April 27, 2021

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